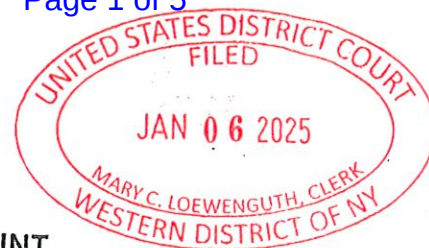


UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

David Johnson

Plaintiff(s),

v.

Dan wolf  
Angela campbell

Sean Combs

Joi Kemp

Defendant(s).

## COMPLAINT

(Pro Se Prisoner)

Case No. 25cv 6015 MAV  
(Assigned by Clerk's  
Office upon filing)

## Jury Demand

☒ Yes☐ No

## NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore **not** contain: an individual's social security number, taxpayer identification number, or birth date; the name of a person known to be a minor; or a financial account number. A filing may include **only**: the last four digits of a social security number or taxpayer-identification number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Fed. R. Civ. P. 5.2.

## I. LEGAL BASIS FOR COMPLAINT

This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution and laws of the United States. Indicate below the federal basis for your claims.

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)  
☐ *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)  
☐ Other (please specify) Civil rights

II.

## PLAINTIFF(S) INFORMATION

Name: David Johnson  
 Prisoner ID #: 19D0019  
 Place of detention: Mid-State Correctional Facility  
 Address: P.O. Box 2500 Marcy NY 13403

Indicate your confinement status when the alleged wrongdoing occurred:

- ☐ Pretrial detainee  
☐ Civilly committed detainee  
☐ Convicted and sentenced state prisoner  
☐ Convicted and sentenced federal prisoner  
☐ Immigration detainee
- NONE

Provide any other names by which you are or have been known and any other identification numbers associated with prior periods of incarceration:

D3

If there are additional plaintiffs, each person must provide all of the information requested in this section and must sign the complaint; additional sheets of paper may be used and attached to this complaint.

## III. DEFENDANT(S) INFORMATION

Defendant No. 1:

Dan Wolf

Name (Last, First)

Highway chief / Football coach

Job Title

OG Den. NY Churchville Chili Highschool

Work Address

North Chili NY

City

State

Zip Code

Defendant No. 2:

Angela Campbell

Name (Last, First)

Court Assistant

Job Title

New York city  
 Work Address

City State Zip Code  
 Defendant No. 3: Joi Kemp  
 Name (Last, First)  
Private Nurse  
 Job Title  
Texas, Katy  
 Work Address

City State Zip Code  
 Defendant No. 4: ~~Sean Combs~~ Sean Combs  
 Name (Last, First)  
~~Music Mogul~~ Music Mogul  
 Job Title  
 Work Address

City State Zip Code

If there are additional defendants, the information requested in this section must be provided for each person; additional sheets of paper may be used and attached to this complaint.

#### IV. STATEMENT OF FACTS

State briefly and concisely the facts supporting your claims. Describe the events in the order they happened. Your statement of facts should include the following:

- The date(s) on which the events occurred
- Where these events took place (identify the facility and, if relevant, the specific location in the facility)



- How each defendant was involved in the conduct you are complaining about

If you were physically injured by the alleged misconduct, describe the nature of your injuries and the medical evaluation and treatment you were provided. You need not cite to case law or statutes or provide legal argument in the Statement of Facts. Use additional sheets of paper if necessary.

Dan wolf Angela Campbell and  
Joi Kemp Drugged Me and sex  
trafficked Me using a fraud porno  
contract and Never paid me  
around the time of August 2018  
Sean Combs solicited them and  
had sex with me 3 times without  
ever getting verbal consent from me  
or me ever seeing him. My Bladder  
was in extreme pain and when I  
went back to school all my peers  
called me P. Diddy and made fun  
of me Angela Campbell has been  
hypnotizing me since I was very young  
my mom Joi Kemp has been abusing  
me. Dan wolf violating Saenz v Roe  
at my school, I told Combs to stop.

V. STATEMENT OF CLAIM(S)

State briefly and concisely the constitutional and/or statutory basis for each claim you seek to assert and identify the defendant(s) against whom each claim is

asserted. Commonly asserted claims include: excessive force; failure to protect; deliberate indifference to medical needs; unconstitutional conditions of confinement; denial of due process in a disciplinary or other proceeding; denial of equal protection; retaliation for the exercise of a First Amendment right; and interference with free exercise of religion. Legal argument and case citations are not required. Use additional sheets of paper if necessary.

FIRST CLAIM

Sex trafficking

SECOND CLAIM

Rape Revenge Porn

THIRD CLAIM

physical Abuse sexual Assault

VI. RELIEF REQUESTED

State briefly what relief you are seeking in this case.

100 Million US Dollars  
or 10 Million

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 12/29/24

David Johnson

Plaintiff's signature  
(All plaintiffs must sign the complaint)